

EXHIBIT 12

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

-----x
WILLIENE JACKSON-JONES, et :
al., on behalf of themselves :
and all others similarly :
situated, : Civil Action No.:
Plaintiffs, : 2:23-cv-02567-ODW-SK
v. :
EPOCH EVERLASTING PLAY, LLC, :
et al., :
Defendants. :

-----x
Videotaped Deposition of
WILLIENE JACKSON-JONES
Conducted Virtually
Tuesday, March 19, 2024
8:34 a.m. PST

Job No.: 530054

Pages: 1 - 170

Reported By: DEBRA BOLLMAN FARFAN, RDR, CRR, CRC

CA CSR No. 11648

1 house anymore, even way before I gave it away. 10:52:32

2 Q. So that would have been sometime earlier in 10:52:41

3 2022 you put them away; and then there was a window 10:52:44

4 of time, deciding what to do with them, before you 10:52:46

5 gave them to Karla? 10:52:49

6 A. It was like mid-2022 because they were 10:52:50

7 put -- they were put away -- actually, I had put 10:52:56

8 them in her brother's room so that she couldn't 10:53:00

9 even see them. They were in canisters. 10:53:02

10 And then we gave them away towards the end 10:53:04

11 of 2022, September or somewhere up in there. 10:53:08

12 Q. And am I correct in understanding that 10:53:15

13 there was a time in which you were trying to decide 10:53:19

14 whether to just throw them all away or give them to 10:53:23

15 your friend Karla? Is that right? 10:53:26

16 A. Yes. 10:53:27

17 Q. What ultimately made you decide to give 10:53:28

18 them to your friend Karla instead of throwing them 10:53:30

19 away? 10:53:33

20 A. Just my daughter-in-law had packed up a 10:53:33

21 bunch of stuff to give to Karla, some clothes and 10:53:37

22 some other toys. And I was the contact person 10:53:41

23 between giving that bag to my co-worker. And so 10:53:45

24 once I was given -- since I was going to be giving 10:53:49

25 that bag to her, I put that stuff in there with it 10:53:52

Transcript of Williene Jackson-Jones
Conducted on March 19, 2024

170

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE CENTRAL DISTRICT OF CALIFORNIA

3 -----x
4 WILLIENE JACKSON-JONES, et :
5 al., on behalf of themselves :
6 and all others similarly :
7 situated, :
8 :
9 Plaintiffs, :
10 :
11 v. :
12 EPOCH EVERLASTING PLAY, LLC, :
13 et al., :
14 :
15 Defendants. :
16 -----x

17 I, DEBRA BOLLMAN FARFAN, Certified
18 Shorthand Reporter, License No. 11648, in the State
19 of California, hereby certify that the foregoing is
20 a true and accurate transcript of the proceedings
21 taken before me on Tuesday, March 19, 2024, as
22 thereon stated.

23 I declare under penalty of perjury that the
24 foregoing is true and correct.

25 Executed at Norco, California, on the
 24th of March, 2024.



DEBRA BOLLMAN FARFAN, CSR 11648
RDR, CRR, CRC